## **EXHIBIT A**

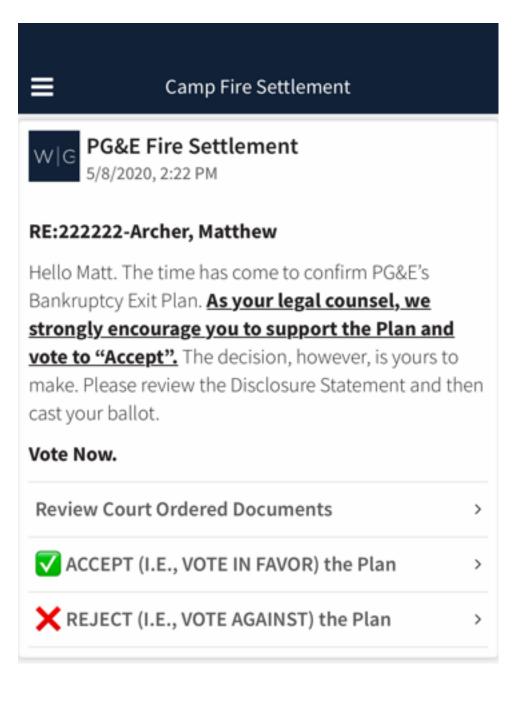
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## 1 UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA 2 SAN FRANCISCO DIVISION 3 In re: Bankruptcy Case No. 19-30088 (DM) 4 **PG&E CORPORATION** Chapter 11 5 (Lead Case) - and -(Jointly Administered) 6 PACIFIC GAS AND ELECTRIC COMPANY, **DECLARATION OF MATT ARCHER** 7 REGARDING WILLIAM B. ABRAMS MOTION TO DESIGNATE 8 Debtors. IMPROPERLY SOLICITED VOTES PURSUANT TO 11 U.S.C. §1125(B) AND 9 1126(E) AND BANKRUPTČY RÙĹE 2019 10 □Affects PG&E Corporation Date: May 12, 2020 ☐ Affects Pacific Gas and Electric Company Time: 10:00 a.m. (Pacific Time) 11 ⊠Affects both Debtors Place: United States Bankruptcy Court Courtroom 17, 16th Floor 12 \* All papers shall be filed in the Lead Case, 450 Golden Gate Avenue No. 19-30088 (DM). San Francisco, CA 94102 13 Re: Docket No. 6799, 6964, 6963 14 15 DECLARATION OF MATT ARCHER 16 Matt Archer declares the following pursuant to 28 U.S.C. § 1746: 17 1. I am the head of the Mass Torts IT Department of WATTS GUERRA, with primary 18 responsibility over the database management and digital communications with its California Fires 19 client base. 20 2. I designed the text and email communications to our clients concerning the voting 21 22 process, and the ballot dissemination to our clients in such digital media. These designs and 23 communications were each approved by attorneys at WATTS GUERRA before being disseminated 24 to its clients. Importantly, only WATTS GUERRA clients who timely filed Notices of Claims prior 25 to the Court's Amended Bar Date of December 31, 2019, received ballots from WATTS GUERRA 26 during the March 31, 2020 to May 15, 2020 voting period with respect to the Amended Plan. 27 28

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- 3. Our clients can be categorized into three categories: (1) those who provided us with a cell phone number, to whom we could text; (2) those who did not provide us a cell phone number, but did provide us with an email address, to whom we could email; and (3) those who provided us with neither a cell phone number, nor an email address, to whom we could communicate only through physical mail.
  - a. As to those WATTS GUERRA clients in category #1 above those who provided us with a cell phone number, to whom we could text I prepared a text communication to permit those individuals to vote via ballot sent by text. A template of that ballot is attached hereto:



Review Court Ordered Documents			
Disclosure Statement - Debtors' and Shareholder     Proponents' Joint Chapter 11 Plan of Reorganization dated     January 31, 2020			
Click Here to Review the Disclosure Statement			
<ol> <li>Judge Montali Order dated March 17, 2020 Approving the Proposed Disclosure Statement; Plan Solicitation and Voting Procedures; Forms of Ballots, Solicitation Packages and Related Notices</li> </ol>			
Click Here to Review the Order			
3. Confirmation Hearing Notice notifying all parties of the May 27, 2020 @ 10:00 a.m. hearing to confirm the Plan			
Click Here to Review the Confirmation Hearing Notice			
4. PGE Fire Settlement Ballot			
Click Here to Review the Fire Victim Ballot			
✓ ACCEPT (I.E., VOTE IN FAVOR) the Plan >			
X REJECT (I.E., VOTE AGAINST) the Plan  →			

b. As to those WATTS GUERRA clients in category #2 above - those who did not provide us with a cell phone number, but did provide us with an email address –
 I prepared a communication to permit those individuals to vote via ballot sent by email, where they could respond via email by either typing "ACCEPT" or by

instead by communicating their decision to "REJECT" the Amended Plan.

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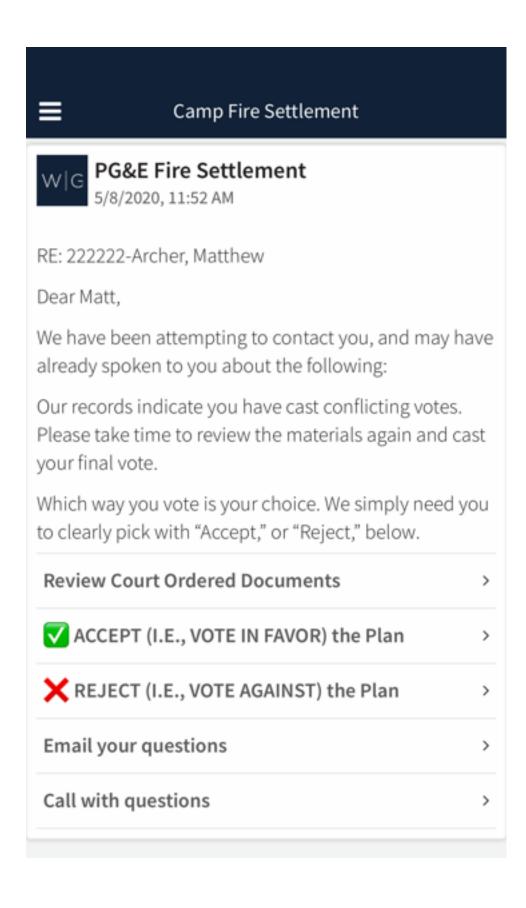
- c. As to those WATTS GUERRA clients in category #3 above those who did not provide us with a cell phone number, nor with an email address I prepared a communication to permit those individuals to vote via ballot sent by mail, where they could respond by either selecting either "ACCEPT" to communicate their acceptance the Amended Plan, or "REJECT to communicate their rejection of the Amended Plan.
- 4. These votes are each collected and tallied by me. There is a digital record of each "text" vote received, and whether the vote cast was to "ACCEPT" or to "REJECT" the Amended Plan. Likewise, I have a digital record of each "email" vote received, and whether the vote cast was to "ACCEPT" or to "REJECT" the Amended Plan. Finally, as to paper ballots cast, I maintain a PDF record of each paper ballot mailed back or otherwise received by WATTS GUERRA. Thus, WATTS GUERRA has a record of each vote received from its clients. I pledge to maintain the records of each vote received by WATTS GUERRA regardless of mode so that the Court or any third-party it assigns, may review our records to audit the vote totals submitted by WATTS GUERRA to Prime Clerk on May 15, 2020.
- 5. As of today, WATTS GUERRA has received clear indication from its clients as follows:
  - a. <u>13,473</u> "ACCEPT" votes; and
  - b. 108 "REJECT" votes.

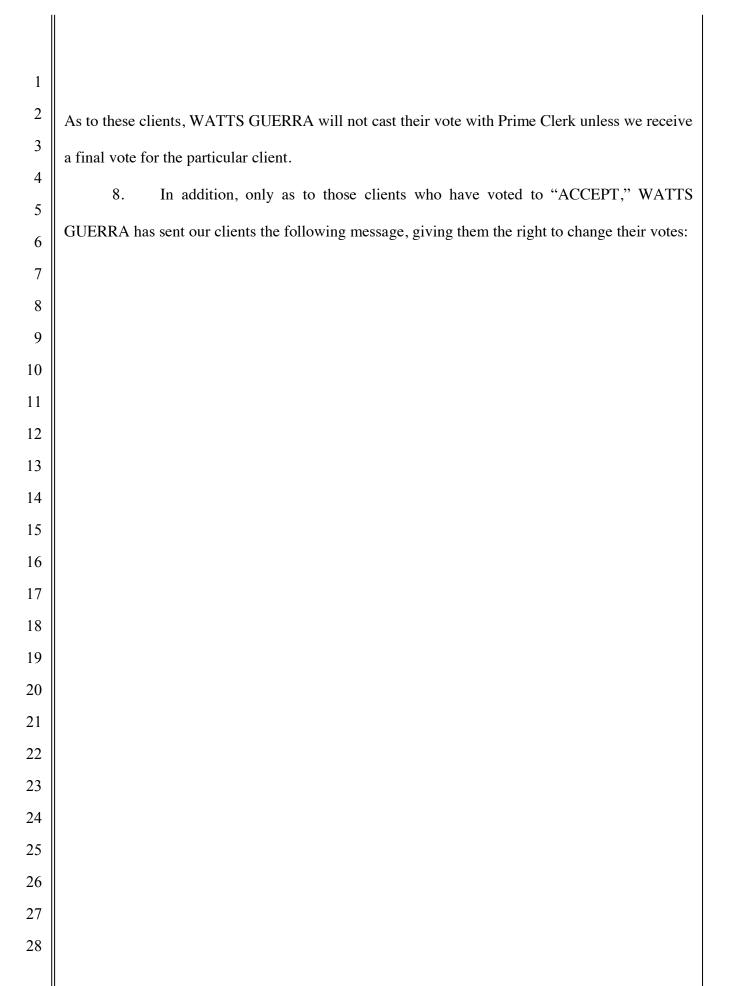
I have carefully eliminated any duplicate votes cast by a limited number of WATTS GUERRA to ensure that only one vote for each client is submitted to Prime Clerk.

6. There have been no instances of WATTS GUERRA changing a client's vote without documented consent and a documented request to do so. There have only been 56 votes changed and only at the client's request in writing.

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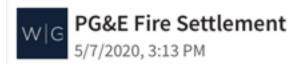
1	7. As to 71 WATTS GUERRA clients, we have received conflicting votes of both
2	"ACCEPT" and "REJECT," and therefore, we have sent out the following message advising such
3	clients of such, and asking for their final vote as follows:
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## Camp Fire Settlement



RE: 222222-Archer, Matthew

Hello Matt.

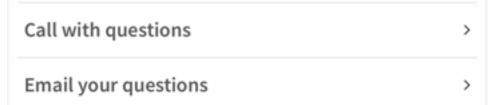
As the deadline for voting on the proposed \$13.5 billion settlement approaches, we are messaging our clients who have registered their vote with us to confirm that we have your response accurately recorded.

If you are receiving this message, we have received your vote to ACCEPT the settlement agreement. You have voted to ACCEPT for the following claim:

## 222222-Archer, Matthew

If this information is not correct and you would like to instead vote to REJECT the settlement, please call or email us immediately using the buttons below.

Thank you for making your voice heard and participating in this important vote. We will submit your vote to the court on your behalf.



If between now and the voting deadline, a WATTS GUERRA client indicates in writing a desire to change their vote from "ACCEPT" to "REJECT," their revised ballot will be provided to Prime Clerk as a vote cast to "REJECT" the Amended Plan.

- 9. By contrast, WATTS GUERRA did not ask any of our 108 clients voting to "REJECT" the plan if they wanted to change their vote. Rather, WATTS GUERRA has notified each of its clients who it shows as having voted to "REJECT" an additional text informing them merely that the firm shows them as having voted to "REJECT."
- 10. WATTS GUERRA has a list of the identity and the corresponding Notice of Claim number at Prime Clerk. The vote tallies to be sent to Prime Clerk will specifically list each individual, their corresponding Notice of Claim number, and the vote to either "ACCEPT" or "REJECT" sent to WATTS GUERRA. WATTS GUERRA will maintain the digital record of every vote collected, and will provide the same to this Court, or any auditing agent selected by it to verify the vote. On or before May 15, 2020, I will submit WATTS GUERRA's clients' final vote totals to Prime Clerk pursuant to the election they made under Orders of this Court.
- 11. I texted and emailed the court-ordered disclosure statement and other-court-ordered documents to WATTS GUERRA clients together with their ballots beginning on March 31, 2020, and not before. I am also aware that WATTS GUERRA transmitted to its clients on the date paper copies of the court-ordered disclosure statement and other-court-ordered documents to WATTS GUERRA clients, together with paper ballots on that date as well.
- 12. I have personal knowledge of the matters in this declaration, and I affirm that the facts set forth in this declaration are true and correct.

Dated May 8, 2020

/s/ Matt Archer
Matt Archer